

David C. Parisi (SBN 162248)
Suzanne Havens Beckman (SBN 188814)
Azita Moradmand (SBN 260271)
PARISI & HAVENS LLP
15233 Valleyheart Drive
Sherman Oaks, California 91403
(818) 990-1299 (telephone)
(818) 501-7852 (facsimile)
dcparsi@parisihavens.com
shavens@parisihavens.com

Ethan Preston (SBN 263295)
PRESTON LAW OFFICES
21001 North Tatum Boulevard, Suite 1630-430
Phoenix, Arizona 85050
(480) 269-9540 (telephone)
(866) 509-1197 (facsimile)
ep@eplaw.us

*Attorneys for Plaintiff Johnny Wang, on his own
behalf and behalf of all others similarly situated,*

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JOHNNY WANG, an individual, on his
own behalf and on behalf of all others
similarly situated,

Plaintiff,

v.

ASSET ACCEPTANCE, LLC, and
TRANS UNION, LLC, Delaware limited
liability companies, and DOES 1-100,
inclusive,

Defendants.

No. 3:09-CV-4797-SI

The Honorable Susan Illston

**STIPULATION AND ~~PROPOSED~~
ORDER VACATING OUTSTANDING
DEADLINES**

1 Plaintiff Johnny Wang (“Wang”) and Defendants Asset Acceptance, LLC (“Asset”) and
2 Trans Union, LLC (“Trans Union”) hereby stipulate to vacate the outstanding deadlines and
3 hearing dates in this matter and to schedule a hearing on Plaintiff’s impending Motion for
4 Preliminary Approval:

5 WHEREAS, there are outstanding dates and deadlines in this matter as follows:

- 6 1. Hearings on Motion for Class Certification and Motion to Extend Deadline for
7 Class Certification: September 16, 2011, 9:00 a.m.
- 8 2. Deadline to File Motion for Summary Judgment: September 23, 2011
- 9 3. Further Case Management Conference: October 7, 2011, 3:00 p.m.
- 10 4. Pre-Trial Conference: February 14, 2012, 3:30 p.m.
- 11 5. Jury Trial: February 27, 2012, 8:30 a.m.

12 WHEREAS, the Parties seek preliminary approval of a class action settlement;

13 WHEREAS, the Parties stipulate that the Court does not need to rule on the pending letter
14 briefs regarding motions to compel, which are Docket Nos. 125, 126 and 127;

15 WHEREAS, the Parties stipulate that no hearing is necessary on the pending Motion for
16 Class Certification and Motion to Extend Deadline for Class Certification;

17 WHEREAS, Plaintiff intends to file a Motion for Preliminary Approval of Class
18 Settlement and schedule a hearing date for same in the coming weeks;

19 THEREFORE, the parties stipulate and hereby request the Court order that:

- 20 1. The following dates and deadlines in this matter are vacated:
 - 21 a. Hearing on Motion for Class Certification and Motion to Extend Deadline for
22 Class Certification: September 16, 2011, 9:00 a.m.
 - 23 b. Deadline to File Motion for Summary Judgment: September 23, 2011
 - 24 c. Further Case Management Conference: October 7, 2011, 3:00 p.m.
 - 25 d. Pre-Trial Conference: February 14, 2012, 3:30 p.m.
 - 26 e. Jury Trial: February 27, 2012, 8:30 a.m.
- 27 2. The Court will not rule on the pending letter briefs regarding discovery.

1 Dated: August 31, 2011

By: s/David C. Parisi
David C. Parisi (162248)
Suzanne Havens Beckman (188814)
Azita Moradmand (260271)
PARISI & HAVENS LLP
15233 Valleyheart Drive
Sherman Oaks, California 91403
(818) 990-1299 (telephone)
(818) 501-7852 (facsimile)
dcparsi@parisihavens.com
shavens@parisihavens.com
amoradmand@parisihavens.com

Ethan Preston (263295)
PRESTON LAW OFFICES
21001 North Tatum Blvd., Suite 1630-430
Phoenix, Arizona 85050
(480) 269-9540 (telephone)
(866) 509-1197 (facsimile)
ep@eplaw.us

*Attorneys for Plaintiff Johnny Wang, on his
own behalf and behalf of all others similarly
situated*

14 Dated: August 31, 2011

By: s/Stephen J. Newman
Stephen J. Newman
STROOCK & STROOCK & LEVAN LLP
2029 Century Park East
Los Angeles, California 90067
(310) 556-5800 (telephone)
(310) 556-5969 (facsimile)
snowman@stroock.com

Robert J. Schuckit (pro hac vice)
William R. Brown (pro hac vice)
Karen Butler Reisinger (pro hac vice)
SCHUCKIT & ASSOCIATES, P.C.
4545 Northwestern Drive
Zionsville, Indiana 46077
317-363-2400 (telephone)
317-363-2257 (facsimile)
rschuckit@schuckitlaw.com
wbrown@schuckitlaw.com
kreisinger@schuckitlaw.com

Attorneys for Defendant Trans Union, LLC

1 Dated: August 31, 2011

By: s/Tomio B. Narita
Tomio B. Narita (156576)
Jeffrey A. Topor (195545)
SIMMONDS & NARITA LLP
44 Montgomery Street, Suite 3010
San Francisco, CA 94104-4816
(415) 283-1000 (telephone)
(415) 352-2625 (facsimile)
tnarita@snllp.com
jtopor@snllp.com

6 *Attorneys for Defendant*
7 *Asset Acceptance, LLC*

[PROPOSED] ORDER


Pursuant to stipulation of the parties and GOOD CAUSE APPEARING thereof, it is hereby ordered that:

3. The following dates and deadlines in this matter are vacated:

- a. Hearing on Motion for Class Certification and Motion to Extend Deadline for Class Certification: September 16, 2011, 9:00 a.m.
- b. Deadline to File Motion for Summary Judgment: September 23, 2011
- c. Further Case Management Conference: October 7, 2011, 3:00 p.m.
- d. Pre-Trial Conference: February 14, 2012, 3:30 p.m.
- e. Jury Trial: February 27, 2012, 8:30 a.m.

4. The Court will not rule on the pending letter briefs regarding discovery.
All pending motions are deemed withdrawn

Dated: September 1, 2011

By: 
The Honorable Susan Illston
United States District Court
For the Northern District of California